

584-07/PJG/LJK

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DOUBLE HAPPINESS SHIPPING
COMPANY LIMITED,

Plaintiff,

-against-

COSMOTRADE EXPORTS S.A.,

Defendant.

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07 CV 4615 (LTS)

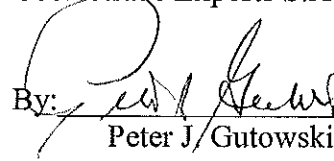
NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed Affidavit of Peter J. Gutowski dated January 18, 2008, the exhibits annexed hereto, the accompanying Memorandum of Law and the pleadings and proceedings previously had herein, the Defendant will move this Court before the Honorable Laura T. Swain in Courtroom 17C of the United States District Court for the Southern District of New York, 500 Pearl Street, New York, at a time and date to be established by the Court for an Order pursuant to Supplemental Rules E(2)(b) and/or E(7) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure directing the Plaintiff to provide counter security in the sum of \$433,062.10 and the other relief outlined in the accompanying motion paper.

PLEASE TAKE FURTHER NOTICE that pursuant to the agreement of the parties, opposition papers, if any, are to be served and filed on or before February 1, 2008, with reply papers due on February 7.

Dated: New York, New York
January 18, 2007

FREEHILL, HOGAN & MAHAR LLP
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By: 

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